

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

JAMES G. GILLILAND

Plaintiff

vs.

PROVIDENCE CREEK SERVICES, LLC

A Delaware Corporation

Defendant,

)Civil Case No.:06-51 JJF

)

)Trial by Jury Demanded

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MOTION TO WITHDRAW

APPEARS NOW before this honorable Court Michael J. Goodrick, Esquire, who pursuant to Local Rules for Civil Practice and Procedure of the United States District Court for the District of Delaware Rule 83.7 hereby moves this Court to be permitted to withdrawal as counsel for Plaintiff on the following grounds:

1. That counsel and client are in disagreement as to certain matters critical to the proceedings.
2. That representation has been rendered unreasonably difficult by circumstances arising during the course of litigation.
3. That the client is unable to substantially fulfill certain obligations to the attorney and cannot be reasonably expected to fulfill those obligations in the future.
4. The Plaintiff, having been informed and consulted as to the undersigned's intent to file these proceedings has acknowledged same and consents to his withdrawal.

WHEREFORE the undersigned counsel prays for the reasons cited above that he be permitted by the Court to withdraw his appearance.

MICHAEL J. GOODRICK, P.A.

/s/ Michael J. Goodrick
Michael J. Goodrick (#170)
18-B Trolley Square
Wilmington, DE 19806
(302) 778-5360
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of July 2006, a copy of the enclosed Motion to Withdraw, Notice of Service and Certificate of Counsel were sent electronically to:

Timothy Holly, Esquire
Matthew F. Boyer, Esquire
Connolly Bove Lodge & Hutz LLP
P.O. Box 2207
Wilmington, DE 19899

and two copies of the above pleadings were forwarded by First Class Mail, by Certified Mail, Return Receipt Requested, and by facsimile to the Plaintiff

James G. Gilliland
2468 Harvey Straughn Rd.
Clayton, DE 19938

Facsimile 1-(302) 653-3637

MICHAEL J. GOODRICK, P.A.

/s/Michael J. Goodrick
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Attorney for Plaintiff